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June 15, 2021

VIA ECF

The Honorable P. Kevin Castel, U.S.D.J. United States District Court Southern District of New York 500 Pearl St.

New York, New York 10007

Re: Vlisco B.V. v. AKN Fabrics Inc. and Anand Kumar Nair Case No. 1:21-cv-03815 (PKC)

Dear Judge Castel:

This letter is submitted jointly on behalf of Plaintiff Vlisco B.V. ("Vlisco") and Defendants AKN Fabrics Inc. and Anand Kumar Nair (together, "Defendants") (collectively, "Parties").

As noted in the Parties' joint letter of May 28, 2021 (See ECF No. 29), the parties are working toward negotiating a full resolution to this matter, including a confidential settlement agreement. In view of the foregoing, respective counsel for Plaintiff and Defendants stipulate and agree that Defendants' time to Answer or otherwise respond to the Complaint be extended an additional thirty (30) days, to and including July 14, 2021. This is the second application on consent to extend Defendants' deadline to respond to the Complaint (See ECF Nos. 27 & 32).

Additionally, counsel for both Parties consent to an adjournment of the Initial Conference, currently scheduled for July 8, 2021, and a concomitant extension of all initial Rule 26 deadlines. This is the first application on consent to adjourn the Initial Conference.

We thank the Court in advance for its consideration of this request.

Respectfully submitted,

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